

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
<i>v.</i>	§	Case No. 5:21-cv-844-XR
	§	
GREGORY W. ABBOTT, et al.,	§	
<i>Defendants.</i>	§	
	§	

**STATE DEFENDANTS NOTICE OF JOINDER TO INTERVENOR-DEFENDANTS’
MOTION FOR SUMMARY JUDGMENT (ECF NO. 608)**

Defendants Gregory W. Abbott, in his official capacity as Governor of Texas, Jane Nelson, in her official capacity as Secretary of State (“the Secretary”), Warren K. Paxton, in his official capacity as Attorney General of Texas, and the State of Texas (“State Defendants”), hereby join Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee (“RNC”), National Republican Senatorial Committee (“NRSC”), and National Republican Congressional Committee’s (“NRCC”) Motion for Summary Judgment (ECF No. 608). As the motion explains, this Court should grant summary judgment for the Intervenor-Defendants, because SB 1 does not implicate, much less violate, the federal materiality provision of 52 U.S.C. § 10101. *See id.* at 6–13. Furthermore, this Court should grant summary judgment for the Intervenor-Defendants because Plaintiffs’ vagueness claims are premature and unwarranted, because Plaintiffs’ First Amendment claims are unfounded and meritless, and because SB 1 fully complies with Section 208 of the Voting Rights Act. *See id.* at 16, 22, 27. In any event, even if Plaintiffs could show a minimal burden, the State’s interest in uniform, secure, free, and fair elections far outweigh such a showing.

Therefore, this Court should grant State Defendants and Intervenor-Defendants summary judgment.

Date: May 26, 2023

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

RYAN G. KERCHER
Deputy Chief, General Litigation Division
Tex. State Bar No. 24060998

BRENT WEBSTER
First Assistant Attorney General

/s/ Kathleen T. Hunker
KATHLEEN T. HUNKER
Special Counsel
Tex. State Bar No. 24118415

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil
Litigation

WILLIAM D. WASSDORF
Assistant Attorney General
Tex. State Bar No. 24103022

CHRISTOPHER D. HILTON
Chief, General Litigation Division
Tex. State Bar No. 24087727

AMY SNOW HILTON
Assistant Attorney General
Tex. State Bar No. 24097834

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2120
Fax: (512) 320-0667
kathleen.hunker@oag.texas.gov
christopher.hilton@oag.texas.gov
ryan.kercher@oag.texas.gov
will.wassdorf@oag.texas.gov
amy.hilton@oag.texas.gov

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on May 26, 2023, and that all counsel of record were served by CM/ECF.

/s/ KATHLEEN T. HUNKER
KATHLEEN T. HUNKER